JLJ LAW

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February 14, 2022

## Via ECF

Honorable Nelson S. Román United States District Judge Southern District of New York 300 Quarropas Street White Plains, NY 10601

Deft's request to adjourn the in-person Sentencing from Mar. 22, 2022 or Mar. 25, 2022 to May 25, 2022 at 10:00 am with an alternate date of May 26, 2022 at 10:00 am is GRANTED without objection by the Gov't. Clerk of Court is requested to terminate the motion (doc. 64).

Dated: Feb. 23, 2022

Re: *United States v. Rolando Garcia*, 20 Cr. 446 (NSR) -01

Dear Judge Román:

HON, NELSON S. ROMAN UNITED STATES DISTRICT JUDGE

SO ORDERED:

I represent Mr. Rolando Garcia in the above-referenced matter, having been appointed as substitute counsel pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. § 3006A, on January 26, 2021. On December 21, 2021, Mr. Garcia pleaded guilty to Hobbs Act robbery and brandishing a firearm during and in relation to, and in furtherance of, a crime of violence. Sentencing is currently scheduled for March 22, 2022 at 1:30 PM. I am writing to request an adjournment of sentencing for at least 60 days. The government does not object to this request.

I am writing to request an adjournment for several reasons. First, it would allow our mitigation specialist and psychologist time to gather and meaningfully review the records necessary to draft the reports that will accompany our sentencing submission. Second, because our client's family lives in the Dominican Republic and does not own a computer or tablet, defense counsel will need time to arrange how best to receive character letters. Finally, as the Court is well aware, defense counsel is still navigating the challenges presented by the COVID-19 pandemic with regard to regular and reliable access to our client. To ensure that we have meaningful conversations with Mr. Garcia in the weeks leading up to sentencing and for the aforementioned reasons, we request an adjournment of sentencing for at least 60 days.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Jennifer R. Louis-Jeune

USDC SDNY DOCUMENT ELECTRONICALLY FILED 2/23/2022 DATE FILED: